

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA, *
*
*
v. * CRIMINAL NO. 1:22-336-SAG
*
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*
ANNA GABRIELIAN and *
JAMIE LEE HENRY, *
*
Defendants.

.....

**UNOPPOSED MOTION TO MODIFY
DEFENDANTS' CONDITIONS OF RELEASE**

The Court Orders setting Defendants' conditions of release place them under home confinement with a 12-hour curfew. ECF 131, 133. Defendants seek Court permission to modify their conditions of release to allow them to travel to and stay in North Carolina for a one-week vacation (from March 23rd to March 31st) with their two young children, with specific times and location to be approved by Pretrial Services and subject to any additional reporting requirements required by Pretrial Services. If approved, the Defendants would travel to North Carolina by car on the morning of Saturday, March 23rd and return to their residence by the evening of Sunday, March 31st.

Government counsel and Pretrial Services have authorized counsel to represent that they do not object to the motion.

Respectfully submitted,

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/s/ Christopher Mead

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of March, 2024, a true and correct copy of the foregoing and corresponding proposed Order was electronically filed and served on all counsel through ECF.

/s/ Christopher B. Mead